

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR (PHK)

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

**[PROPOSED] ORDER
GOVERNING DISCOVERY
LIMITATIONS APPLICABLE TO
BELLWETHER PERSONAL INJURY AND
SCHOOL DISTRICT PLAINTIFFS**

The Court hereby ORDERS the following limitations on written discovery by the Bellwether Personal Injury (“PI”) and School District (“SD”) Plaintiffs in the MDL and JCCP, pursuant to the Parties’ stipulation, the Court’s Oral Ruling at the Discovery Management Conference held on September 12, 2024, and the Court’s rulings in Discovery Management Order (“DMO”) 10 (ECF 1157).

Personal Injury Bellwether Plaintiff Discovery Limitations

1. Each of the 12 MDL Bellwether PI Plaintiffs and each of the 21 JCCP Bellwether PI Plaintiffs is allotted up to seven (7) Interrogatories (“Rogs”) and seven (7) Requests for Admission (“RFAs”) on issues related specifically to each individual Bellwether PI Plaintiff for each of the four main Defendant groups in cases where the Defendant is a party to the action (*i.e.*, Meta, TikTok, Snap, and YouTube).

2. The seven (7) Rogs may include up to four (4) individual Rogs (*i.e.*, Rogs that may be unique to each PI Bellwether Plaintiff); up to two (2) Rogs that must be identical across all Bellwether PI Plaintiffs in the MDL and JCCP; and one (1) Rog that must be identical for all Bellwether PI Plaintiffs within each respective proceeding (*e.g.*, within the MDL or within the JCCP).

3. The seven (7) RFAs may include up to three (3) individual RFAs (*i.e.*, RFAs that may be unique to each PI Bellwether Plaintiff); up to two (2) RFAs that must be identical across all Bellwether PI Plaintiffs in the MDL and JCCP; and up to two (2) RFAs that must be identical for all Bellwether PI Plaintiffs within each respective proceeding (*e.g.*, within the MDL or within the JCCP).

4. The MDL Bellwether PI Plaintiffs’ request for five (5) additional RFAs/Form Rogs on five (5) affirmative defenses as to each Bellwether PI Plaintiff is not yet ripe, and the Parties are instructed to meet and confer after Defendants’ service of their answers to the relevant complaint(s) in the MDL.

School District Bellwether Plaintiff Discovery Limitations

5. Each of the 12 MDL Bellwether SD Plaintiffs is allotted up to nine (9) Rogs and nine (9) RFAs on issues related specifically to each individual Bellwether SD Plaintiff for the each of the four main Defendant groups in cases where the Defendant is a party to the action (*i.e.*, Meta, TikTok, Snap, and YouTube).

1 6. The nine (9) Rogs may include up to five (5) individual Rogs (i.e., Rogs that may be unique
2 to each SD Bellwether Plaintiff) and up to four (4) Rogs that must be identical across all Bellwether SD
3 Plaintiffs in the MDL.

4 7. The nine (9) RFAs may include up to four (4) individual RFAs (i.e., RFAs that may be
5 unique to each SD Bellwether Plaintiff) and up to five (5) RFAs that must be identical across all Bellwether
6 SD Plaintiffs in the MDL.

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9 **IT IS SO ORDERED.**

10 Dated: September __, 2024

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12 MAGISTRATE JUDGE PETER H. KANG
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1 Dated: September 19, 2024

Respectfully submitted,

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that concurrence in the filing of this document has been obtained from each signatory hereto.

Dated: September 19, 2024

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